1	JENNIFER BERGH		
2	Nevada Bar No. 14480 QUILLING SELANDER LOWNDS		
3	WINSLETT & MOSER, P.C.		
4	2001 Bryan Street, Suite 1800 Dallas, TX 75201		
	Telephone: (214) 560-5460		
5	Facsimile: (214) 871-2111 jbergh@qslwm.com		
6	Counsel for EGS Financial Care, Inc.		
7	**Designated Attorney for Personal Service**		
8	Alexander P. Williams, Esq. Nevada Bar No.: 14644		
9	6605 Grand Montecito Parkway, Suite 200		
10	Las Vegas, Nevada 89149		
11	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA		
12			
13	Diane St. Clair,	Case No. 2:20-cv-1880-GMN-VCF	
14	Plaintiff,	JOINT MOTION AND ORDER	
15	v.	EXTENDING DEFENDANT EGS FINANCIAL CARE INC.'S TIME TO	
16	iEnergizer, Inc; GC Services Limited	FILE AN ANSWER OR OTHERWISE	
	Partnership; Teleperformance Business Services	RESPOND TO PLAINTIFF'S COMPLAINT	
17	US, LLC; Alorica, Inc.; and DOES 1-5,	(EIDST DEOLIEST)	
18	Defendants.	(FIRST REQUEST)	
19			
20	Plaintiff Diane St. Clair ("Plaintiff") and EGS Financial Care, Inc. ("EGS") incorrectly		
21	named as Alorica, Inc., by and through their respective counsel, file this Joint Motion Extending		
22	Defendant EGS's Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.		
23	On October 8, 2020, Plaintiff filed her Complaint. The current deadline for EGS to		
24	answer or otherwise respond to Plaintiff's Complaint is October 30, 2020. EGS's counsel wil		
25	need additional time to review the documents and respond to the allegations in Plaintiff's		
26	Complaint. This Joint Motion is made in good faith and not for the purposes of delay.		
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Plaintiff has agreed to extend the deadline in which EGS has to answer or otherwise 1 2 respond to Plaintiff's Complaint up to and including November 13, 2020. This is the first motion 3 for extension of time for EGS to respond to Plaintiff's Complaint. 4 Dated this 26th day of October 2020. 5 **QUILLING SELANDER LOWNDS** 6 WINSLETT & MOSER, P.C. 7 /s/ Jennifer Bergh JENNIFER BERGH 8 Nevada Bar No. 14480 9 2001 Bryan Street, Suite 1800 Dallas, TX 75201 10 (214) 871-2100 (214) 871-2111 Fax 11 jbergh@qslwm.com 12 Counsel for EGS Financial Care, Inc. 13 PRICE LAW GROUP, APC 14 /s/ Steven A. Alpert STEVEN A. ALPERT 15 Nevada Bar No. 8353 16 5940 S. Rainbow Blvd. Las Vegas, NV 89118 17 (702) 794-2008 (866) 401-1457 Fax 18 alpert@pricelawgroup.com Counsel for Plaintiff 19 20 **ORDER** 21 The Joint Motion for Extension of Time for EGS Financial Care, Inc. to file an answer or 22 otherwise respond to Plaintiff's Complaint is so ORDERED AND ADJUDGED. 23 24 Dated this 27th day of October, 2020. 25 26 **UNITED STATES MAGISTRATE JUDGE** 27 28

1	<u>CERTIFICATE OF SERVICE</u>		
2	I hereby certify that on the 26 th day of October 2020, I electronically filed JOINT MOTION		
3	AND ORDER EXTENDING DEFENDANT EGS FINANCIAL CARE, INC.'S TIME TO		
4	FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT with		
5	the Clerk of the Court using the CM/ECF system which will then send a notification of such to		
6	the following counsel of record:		
7 8 9 10	STEVEN A. ALPERT PRICE LAW GROUP, APC Nevada Bar No. 8353 5940 S. Rainbow Blvd. Las Vegas, NV 89118 (702) 794-2008 (866) 401-1457 alpert@pricelawgroup.com Counsel for Plaintiff		
12	Counsel for Plainiff		
13			
4	/s/ Jennifer Bergh		
15	JENNIFER BERGH		
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